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County of Clark and Victor Zavala

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRIAN BORENSTEIN, an individual,

Plaintiff,

vs.

THE ANIMAL FOUNDATION, a domestic
nonprofit corporation; COUNTY OF CLARK,
a political subdivision of the State of Nevada;
SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC, a foreign limited-liability
company domiciled in Delaware; CARLY
SCHOLTEN, an individual; VICTOR
ZAVALA, an individual; and ROE BUSINESS
ENTITIES 1-5; and DOE INDIVIDUALS 1-5,

Defendants,

CASE No.: 2:19-CV-00985-APG-DJA

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANTS COUNTY OF
CLARK AND VICTOR ZAVALA TO
RESPOND TO [189] PLAINTIFF'S
SECOND AMENDED COMPLAINT**

[FIRST REQUEST]

Defendants, COUNTY OF CLARK, and VICTOR ZAVALA (collectively, the "County Defendants"), by and through their counsel, Jonathan D. Blum, Esq., of the law firm Wiley Petersen, and Plaintiff, BRIAN BORENSTEIN, by and through his counsel, Raelene K. Palmer, Esq. of The Palmer Law Firm, P.C., and Robert S. Melcic, Esq., and stipulate hereby request the Court to extend the deadlines for the County Defendants to respond to [ECF 189] Plaintiff's Second Amended Complaint by three days from Tuesday, September 7, 2021 to Friday, September 10, 2021. The Parties also request a seven-day extension on Plaintiff's deadline to file a reply related thereto, from September 24, 2021, to October 1, 2021.

Counsel for the County Defendants has an unexpected emergency motion pending in state court which has precluded other previously- planned obligations. Additionally, Tuesday September 7 is the Jewish holiday of Rosh Hashana. Plaintiff's counsel will be travelling the week of September 24, 2021. This stipulated extension is for good cause, and not for improper delay.

DATED this 1 day of September 2021.

THE PALMER LAW FIRM, P.C.

By: /s/ Raelene Palmer
Raelene K. Palmer, Esq.
Nevada Bar No. 8602
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Robert S. Melcic, Esq.
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4930 Mar Vista Way
Las Vegas, Nevada 89121

*Attorneys for Plaintiff,
Brian Borenstein*

DATED this 1 day of September 2021.

WILEY PETERSEN

By: [Signature]
Jonathan D. Blum, Esq.
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*Attorneys for Defendants,
County of Clark and Victor Zavala*

ORDER

IT IS SO ORDERED.

[Signature]

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: September 2, 2021